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Attorneys for Defendant

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

PAMELA WILLIAMS,)	CIVIL NO. 3:19-cv-03603-WHO
)	
Plaintiff,)	JOINT STIPULATION AND
)	[PROPOSED] ORDER FOR
vs.)	EXTENSION OF TIME TO FILE
)	CROSS-MOTION FOR SUMMARY
ANDREW SAUL,)	JUDGMENT AND RESPONSE TO
Commissioner of Social Security)	PLAINTIFF'S MOTION FOR
)	SUMMARY JUDGMENT
Defendant.)	

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended from April 22, 2020 to **May 22, 2020**. This is Defendant's second request for extension. Good cause exists to grant Defendant's request for extension. Counsel for Defendant (Counsel) has not been feeling well and has been out on intermittent sick leave. Counsel also had to take leave in mid-March to take care of her elderly mother, who also was ill. Counsel is the primary caregiver for her mother.

In addition, Counsel also has over 100+ active social security matters, which require two more dispositive motions until mid-June. Due to unexpected leave and heavy caseload, Counsel needs

1 additional time to adequately review the transcript and properly respond to Plaintiff's Motion for
2 Summary Judgment. The parties further stipulate that the Court's Scheduling Order shall be modified
3 accordingly. Defendant makes this request in good faith with no intention to unduly delay the
4 proceedings.

5 Respectfully submitted,

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7 Dated: April 22, 2020

/s/ Harvey Sackett
(*as authorized by email on April 22, 2020)
HARVEY SACKETT
Attorney for Plaintiff

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11 Dated: April 22, 2020


DAVID L. ANDERSON
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DEBORAH LEE STACHEL
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15 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant

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18 **ORDER**

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20 APPROVED AND SO ORDERED:

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22 DATED: April 23, 2020

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THE HON. WILLIAM H. ORRICK
UNITED STATES DISTRICT COURT JUDGE